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13 Attorneys for MACKENZIE ANNE THOMA, on behalf of herself
14 and all others similarly situated**11 UNITED STATES DISTRICT COURT**
12 CENTRAL DISTRICT OF CALIFORNIA13 MACKENZIE ANNE THOMA, a.k.a
14 KENZIE ANNE, on behalf of herself
15 and all others similarly situated
employees,

16 Plaintiffs,

17 v.

18 VXN GROUP LLC, a Delaware limited
19 liability company; STRIKE 3
20 HOLDINGS, LLC, a Delaware limited
liability company; GENERAL MEDIA
21 SYSTEMS, LLC, a Delaware limited
liability company; MIKE MILLER, an
individual; and DOES 1 to 100,
22 inclusive,

23 Defendants,

CASE NO. 2:23-cv-04901-WLH

**DECLARATION OF RAFAEL
YEDOYAN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PROTECTIVE ORDER**

DECLARATION OF RAFAEL YEDOYAN

I, RAFAEL YEDOYAN, declare and state:

3 1. I am an attorney at law, duly licensed to practice before all the Courts of
4 the State of California and I am an attorney with Bibiyan Law Group, P.C, counsel of
5 record for plaintiff Mackenzie Anne Thoma (“Plaintiff” or “Ms. Thoma”) and all
6 others similarly situated and aggrieved. As such, I am familiar with the file in this
7 matter and if called as a witness I could and would competently testify to the following
8 facts of my own personal knowledge.

9 2. On May 24, 2024, the Parties had an initial meet and confer to discuss
10 the narrowing of the requests in Defendants' subpoena requests. This meet and confer
11 was fruitless.

12 3. The Parties had a second meet and confer on May 31, 2024 to discuss,
13 among other items, the potential narrowing of the requests in Defendants' subpoena.
14 This meet and confer was fruitless.

15 4. Attached hereto as "Exhibit A" is a true and correct copy of Mainboard,
16 LLC's privacy policy.

17 Executed on this Eighteenth of June, 2024, at Los Angeles, California.

/s/ Rafael Yedován

Rafael Yedoyan